



Telecommunication Solution Providers

April 29, 2003

Chief, Wireless Telecommunications Bureau
Federal Communications Commissions
Washington, DC 20554

Subject: ***Amended comments in support of ITA's request for certification to coordinate and certify frequencies in the power, railroad and automobile emergency radio services. (RM-10687)***

Dear Sir:

On April 24, 2003, Lockard & White, Inc. filed comments in support of ITA's position in the above proceeding. L&W would like to amend our comments to clarify our position relative to competitive coordination. While L&W wholeheartedly supports competitive coordination in the power and automobile emergency radio services, L&W does not support competitive coordination in the Railroad Radio Service.

The unique nature of the railroad's use of RF channels (End of Train, Distributed Power, Remote Control Locomotive, Positive Train Control, voice) combined with the complexity of coordinating those channels on a regional, national and international basis, make it impractical for those channels to be successfully coordinated by multiple coordinators, even those with the resources of ITA. The railroad industry utilizes a very complex configuration of RF devices in their day to day operations and the coordination process requires personnel who are experienced not only with the regulatory and technical issues of frequency use, but also with the complex railroad operational issues driving the application of those frequencies.

For these reasons, while L&W supports the introduction of competition in the power and automobile emergency radio services, ***L&W DOES NOT support the introduction of competition in the Railroad Radio Services.***

Please amend our previous comments consistent with the above. If you have any questions, I would be pleased to respond accordingly.

Respectfully submitted,

A handwritten signature in cursive script, reading "Marcus J. Lockard".

Marcus J. Lockard, P. E.
President